

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,
Plaintiff,

v.

EDWARD S. ADAMS,
Defendant.

17-CR-64-DWF-KMM

**DEFENDANT'S MOTION TO
SEAL DOCUMENTS FILED
UNDER TEMPORARY SEAL**

Defendant Edward Adams in the above-captioned action has filed the following under seal:

- Motion and Incorporated Memorandum of Law Asserting Certain Privileges Implicated by Yahoo! Email Seizure
- Exhibit 21 to the above Motion, *In Camera* Submission of Documents in Privilege Log of Sample of Apollo Companies' Privileged Documents from Yahoo! Database
- Exhibit 22 to the above Motion, *In Camera* Submission of Documents in Privilege Log of Adams Communications with Murry & Associates LLC
- Declaration of Thomas Brever, Esq., dated February 5, 2018

Defendant brings this motion pursuant to LR 49.1(d)(1)(A) to seal because each of the above-listed documents contains information that Mr. Adams contends contains attorney-client privileged and attorney work product material that should not be revealed to or accessed by the Government. Unless and until this Court determines that some or all of these materials are not protected by the attorney-client privilege or the work product doctrine, neither the Government nor the public may have access to these

materials in their unredacted form. To allow such access may effectively constitute a waiver of the attorney-client privilege or work product protection and may defeat the purpose of Mr. Adams's motion herein to assert such privilege over these materials.

Dated: February 5, 2018

Respectfully submitted,

/s/ Lance Wade

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